

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Philadelphia Federal Credit Union

CHAPTER 13

Movant

v.s

David Adenaike

Debtor

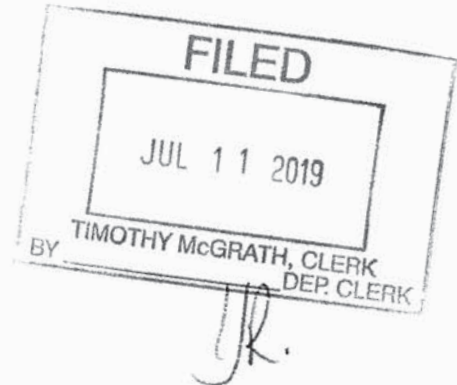
NO 16-13307-amc

David Adenaike

Debtor 11 U.S.C. Section 362

William C. Miller Esq.

Trustee



**MOTION TO DISALLOW DEFAULT AND FORECLOSURE**

**HONORABLE UNITED STATES BANKRUPTCY JUDGE:**

**David Adenaike**("Debtor").David Adenaike is filling Motion to object to Philadelphia Federal Credit Union Certificate of Default and in support thereof.

Dear Honorable Judge Ashley M. Chan, I pray you to consider my plea to disallow Relief from the Automatic Stay and any foreclosure plan from the Philadelphia Federal Credit Union

Reasons shown below;

A handwritten signature consisting of several overlapping loops and a vertical line.

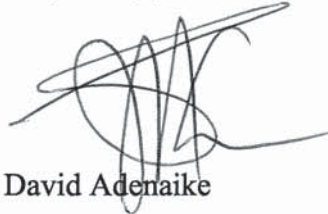
1. David Adenaike contacted the Philadelphia Federal Credit Union lawyer, Mr. Jason Schwartz, on January 4, 2019. Mr. Jason was contacted in written and by telephone, in order to work out a plan to pay the outstanding balance between October, 2018 November, 2018 and December, 2018. Both parties have been talking about timeframe to pay off the post petitions arrears

2. David Adenaike has been making monthly mortgage payments, the original payment is \$694.14, and after the default court hearing in May, 2019. David Adenaike increased the payment to \$700 every month promptly.

3. **According to the Bank court statement, the default amount was \$3,697.41 before the hearing in May, 2019. And after the court hearing in May, 2019 the current default is now \$2,822.99.** David Adenaike also make an extra payment toward the outstanding balance monthly.

4. David Adenaike ("Debtor") respectfully objects to Motion that permitted ("PFCU") to proceed and continue with an action in foreclosure. Upon final hearing of this Motion:

Very Truly yours,

A handwritten signature in black ink, appearing to be 'DA' with a large loop and a horizontal line extending to the right.

David Adenaike